

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION**

PATRICIA J. GIBSON)	
Plaintiff,)	
)	
v.)	CIVIL ACTION NO.: 03-06cv974-MEF-TFM
)	
WESTPOINT STEVENS, INC.)	
et al.,)	
Defendants.)	

REPORT OF PARTIES' RULE 26 (F) MEETING

1. **Meeting.** Pursuant to Fed. R. Civ. P. 26(f), a meeting was held telephonically on February 8, 2007, and was attended by Lateefah Muhammad for the Plaintiff, and James C. Pennington and Fred Suggs, Jr., for the Defendants.

2. **Pre-Discovery Disclosures.** The Parties will exchange on or before March 2, 2007, the information required by local rule 26.1(a)(1), provided that a protective order has been entered by March 2.

3. **Discovery Plan.** The Parties jointly propose to the Court the following discovery plan:

Discovery will be needed with respect to the facts and circumstances of this case, the basis of the Plaintiff's claims and damages, and with respect to the basis of the Defendants' defenses;

All discovery will be commenced in time to be completed by October 19, 2007;

A maximum of thirty (30) interrogatories by each Party to any other Party, and responses are due 30 days after service;

A maximum of seven (7) depositions by Plaintiff and seven (7) by the Defendants;

Each deposition, other than the depositions of experts, are limited to a maximum of eight (8) hours, unless extended by agreement of the Parties;

Reports from retained experts under Rule 26(a)(2) are due from the Plaintiff on or before August 1, 2007, and from the Defendants on or before September 15, 2007;

Supplementation under Rule 26(e) is due on or before October 19, 2007.

The parties stipulate that with respect to any electronically stored documents that are identified or requested during the course of discovery, such documents, to the extent reasonably accessible or otherwise not objectionable, will be produced either as a hard copy on paper, or stored on a CD or DVD formatted as a .PDF (portable document format) file.

The parties have agreed that any inadvertently produced material which any party claims as privileged or as trial preparation material, shall be promptly returned, sequestered or destroyed once a request for the same is made within a reasonable time after disclosure. The parties request that this agreement be reflected in the Court's Scheduling Order.

4. Other Items.

The Parties do not request a conference with the Court before entry of the Scheduling Order.

The Parties request a Pretrial Conference on November 2, 2007.

The Plaintiff contends that Plaintiff should be allowed until June 18, 2007, to join additional parties and amend the pleadings. The Defendant contends that Plaintiff should be allowed until March 18, 2007 to join additional parties and amend the pleadings.

All potentially dispositive motions should be filed by August 6, 2007.

Mediation should be scheduled no later than October 31, 2007.

Settlement cannot fully be evaluated prior to October 19, 2007, provided, however, that if discovery is complete prior to October 19, 2007, the Parties will advise the Court that settlement can be evaluated at an earlier, supplemental date.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due from Parties by October 31, 2007.

Parties should have fourteen (14) days after service of final witness/exhibit lists to file objections under Rule 26 (a)(3).

The case should be ready for trial by December 10, 2007, and at this time, it is expected to take approximately 2-3 trial days.

Respectfully submitted,

Lateefah Muhammad (*Ala. Code* MUH001)
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